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10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF NEVADA

12 In re  
13 META MATERIALS INC.,  
14 Debtor.

Case No.: 24-50792-hlb  
(Chapter 7)

**EX PARTE APPLICATION FOR  
SUPPLEMENTAL ORDER CONFIRMING  
SALE OF CERTAIN ASSETS AND  
INTELLECTUAL PROPERTY ASSETS TO  
PANASONIC PURSUANT TO 11 U.S.C.  
§ 363(b)**

Hearing Date: N/A  
Hearing Time: N/A

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19 Christina Lovato, chapter 7 Trustee for Meta Materials, Inc. (“Trustee”), files her Ex Parte  
20 request for entry of a Supplemental Sale Order Confirming Sale Of Certain Assets And Intellectual  
21 Property Assets To Panasonic Industrial Devices Sales Company of America, Division of  
22 Panasonic Corporation of North America and Panasonic Industry Co., Ltd. Pursuant To 11 U.S.C.  
23 § 363(b) (“Supplemental Sale Order”), in conjunction with that certain Order Approving Online  
24 Auction For Sale Of Personal Property; Approving Division Of Proceeds Agreement With  
25 Landlord Pursuant To 11 U.S.C. § 503(b) (“Auction Order”) at [ECF No. 1660]. This request is  
26 supported by the separately filed Declaration of Trustee Lovato.  
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1           1.       On February 25, 2025, the Trustee filed her Motion For Order Approving Online  
2 Auction For Sale Of Personal Property; Approving Division Of Proceeds Agreement With  
3 Landlord Pursuant To 11 U.S.C. § 503(b) (“Sale Motion”).

4           2.       On February 28, 2025, the Court entered its Order Authorizing Employment Of  
5 Great American Global Partners, Inc. Auctioneer Of Personal Property Inventory And Payment  
6 Of Expenses At Conclusion Of Online Auction. [ECF No. 1608]. In early March 2025, GA  
7 Global created its online presence announcing an auction date of April 3, 2025, for the sale of the  
8 Meta Materials personal property to be sold by auction. **Exhibit A** to the Lovato Declaration is  
9 the GA Global internet web page which provides the specifics for the Auction including the date,  
10 time, list of personal property items included in the auction, bid procedures and other pertinent  
11 information relevant to the auction process.

12           3.       **Exhibit A** describes Miscellaneous Equipment, Facilities Equipment, Office  
13 Equipment and five separate ‘lots’ of Intellectual Property owned by Meta Materials, Inc. With  
14 respect to the Intellectual Property, the GA Global disclosures provide that: “All Meta Materials  
15 Patents will be offered at Auction, Each Patent Lot will be sold by Business Unit, Buyers are  
16 Responsible for doing their own due diligence as to the Status of each Patent.”

17           4.       At the Auction held on April 3, 2025, the items listed in the invoice attached as  
18 **Exhibit B** were purchased by Panasonic Industrial Devices Sales Company of America, Division  
19 of Panasonic Corporation of North America and the related patents listed on **Exhibit C** were  
20 purchased by Panasonic Industry Co., Ltd. (jointly, “Panasonic”).

21           5.       Counsel for Panasonic has requested that the transfer documentation specifically  
22 provide language to the effect that the sale is ‘free and clear’. Because that language is not  
23 specifically included in the Sale Motion or in the Auction Order, Trustee Lovato is requesting this  
24 Supplemental Sale Order. As an additional precaution, Trustee’s counsel has performed formal  
25 UCC-1 searches with the States of California, Delaware and Massachusetts, the three states in  
26 which the Debtor was incorporated, to determine whether there are any creditors asserting a  
27 security interest in any of the personal property being sold through the GA Global auction process.  
28 The searches did not identify any UCC-1 filings, current or lapsed.

1 Based upon the foregoing, Trustee Lovato requests entry of a Supplemental Sale Order  
2 authorizing her to execute Bills of Sale transferring title to personal property assets purchased at  
3 the April 3, 2025 auction conducted by GA Global, which provide that the sales of the personal  
4 property, including Intellectual Property to Panasonic are sold “As-is and Where-is”, free and clear  
5 of liens and encumbrances, or similar language as appropriate in the circumstance.

6 DATED: June 4, 2025.

7 **HARTMAN & HARTMAN**

8 /s/ Jeffrey L. Hartman

9 Jeffrey L. Hartman, Esq., Attorney for Trustee  
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